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The Honorable James L. Robart

10 UNITED STATES DISTRICT COURT OF THE WESTERN
11 DISTRICT OF WASHINGTON AT SEATTLE

12 CAROLINE ANGULO, a single person, ERIC
13 KELLER, a single person, ISABEL LINDSEY
and CHARLES LINDSEY, a married couple,
14 and CHRISTINE BASH, individually and as a
personal representative of the ESTATE OF
15 STEVEN BASH,
Plaintiffs.

16 v.

17 PROVIDENCE HEALTH & SERVICES
WASHINGTON, a non-profit Washington
18 Corporation, also d/b/a PROVIDENCE ST.
MARY MEDICAL CENTER; Dr. JASON A.
19 DREYER, DO, and JANE DOE DREYER,
husband and wife and the marital community
20 thereof; Dr. DANIEL ELSKENS DO, and
JANE DOE ELSKENS, husband and wife and
21 the marital community thereof; and
JOHN/JANE DOES 1-10, and any marital
22 communities thereof,
23

24 Defendants.

NO. 2:22-cv-00915-JLR

**DECLARATION OF WILLIAM A.
GILBERT IN SUPPORT OF MOTION
TO CERTIFY CLASS**

1 I, WILLIAM A. GILBERT, declare under penalty of perjury of the laws of the United
2 States and the State of Washington that the following is true and correct:

3 1. I am an attorney with the Gilbert Law Firm, which represents the Plaintiff
4 Representatives in the above-captioned matter. I make this declaration based on personal
5 knowledge and am competent to be a witness herein.

6 2. I have been a member of the Washington Bar since October, 2000. I am licensed
7 to practice in all Washington State and Federal Courts as well as the Ninth Circuit Court of
8 Appeals. I have also been admitted to practice, *pro hac vice*, in state and federal courts across the
9 United States throughout my career.

10 3. Prior to becoming an attorney, I served my country in the military for four years
11 and also served four years as a deputy sheriff.

12 4. I am currently the managing member of Gilbert Law Firm, P.S. with main offices
13 in Spokane, Washington and a satellite office in Moses Lake, Washington, as well as Everett,
14 Washington (for purposes of this case in particular) and have been the managing member of the
15 Gilbert Law Firm since it opened in 2015. Our website is: <https://wagilbert.com/>

16 5. Prior to this, I was a partner in the law firm of Olive, Bearb, Grelish & Gilbert,
17 PLLC in Seattle, Washington.

18 6. Prior to being asked to join Olive, Bearb, Grelish & Gilbert PLLC, I was a principal
19 with Dano & Gilbert, PLLC in Moses Lake, Washington. Dano & Gilbert PLLC dissolved when
20 my partner of 12 years, Garth Dano, decided to run for public office and became the Grant County
21 Prosecutor in Washington State (since retired from office). Prior to Dano & Gilbert, PLLC I was
22 a principal with Dano, Gilbert & Ahrend, PLLC. Prior to this, I was an associate with the currently
23 named Layman Law Firm in Spokane, Washington.

1 7. My practice is mainly composed of civil litigation matters to include, without
2 limitation, tort, medical negligence, qui tam, employment, civil rights, and government liability. I
3 have also litigated, or assisted in litigating, a number of business litigation matters including anti-
4 trust, and trade secrets cases. I have worked on one class action case which was litigated in
5 Spokane County, Washington. I have also litigated and am currently litigating a multi-plaintiff /
6 multi-jurisdiction case which includes filings in Honduras, El Salvador, and the Inter-American
7 Court of Human Rights. With the exception of the U.S. Supreme Court, I have briefed and argued
8 all manner of motions at all jurisdictional levels.

9 8. My practice has spanned the United States, Canada, and Central and South
10 America. In addition to several million dollar and multi-million dollar verdicts and settlements,
11 my trial successes include a \$716 million wrongful death, dram shop, jury verdict.

12 9. I have been an active faculty member of the nationally acclaimed Trial Lawyers
13 College, based out of Wyoming, originally founded by Gerry Spence. I am a member of several
14 national litigation associations, am a past member of the WSAJ CLE committee and am regularly
15 asked to lecture in Washington and other states on litigation related topics. I have been hired as a
16 consulting litigation expert for the federal government in product liability litigation, and I have
17 been recognized by my peers as one of the top lawyers in Spokane and have been selected to the
18 Washington Super Lawyers list each year from 2012 to present. I have also been recognized as
19 one of the Top 100 Trial Lawyers in the United States. I am a member of the Million Dollar, and
20 Multi-Million Dollar Advocates Forum. In 2012, I was honored by the National Law Journal for
21 having the #1 jury verdict in the Country. I have also received recognition by Lawyers.com as
22 their Editor's Choice Award for top verdicts. These accolades mean far less to me than the pro-
23 social changes created across the country as a result of the hard work of my law firm. Through
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1 our litigation success we have forced changes in corporate and hospital policies and practices that
2 make our world a safer place.

3 10. As lead counsel in this class action lawsuit, our firm will devote all the necessary
4 resources and time in order to pursue this matter fully to settlement or trial. To assist us throughout
5 this case, we have retained numerous experts in the field of neurosurgery, orthopedic spine surgery,
6 neuroradiology, physiatry, pain-management, psychology, hospital corporate oversight, forensic
7 economics; electronic medical records and hospital data security; computer forensics, hospital
8 billing, and billing fraud experts. These experts are leaders in their professional field. Declarations
9 by Dr. Susan Abookire and Dr. Michael Landi that are filed in support of this Motion to Certify
10 are examples of the expertise, and work that has gone into this case to date. Even with limited
11 discovery, we have thousands of hours in this case to date gathering information through resources
12 available outside of discovery in this case. We have expended an extraordinary amount of time
13 and resources into the investigative stage as well as resources, per this Court's order, for
14 jurisdictional discovery costs. My firm's commitment to the class is clear and unequivocal.
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16 11. To the best of my knowledge and belief, the proposed class representatives have no
17 conflicts of interest with class members.
18

19 DATED this 22nd day of November in Spokane, Washington.
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21 GILBERT LAW FIRM, P.S.

22 By: s/William A. Gilbert

23 WILLIAM A. GILBERT, WSBA #30592
24 Attorneys for Plaintiffs
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DATED this 22nd day of November 2023.

Rachel Cook
RACHEL COOK